



Lauren F. Dayton  
MoloLamken LLP  
430 Park Avenue  
New York, NY 10022  
T: 212.607.8176  
F: 212.607.8161  
Ldayton@mololamken.com  
www.mololamken.com

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BY ECF

Hon. Sarah L. Cave  
U.S. Magistrate Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1670  
New York, NY 10007

Defendant EEA Life Settlements, Inc.'s letter-motion seeking to file ECF No. 384-1 (Exhibit 1) under seal (ECF Nos. 383) is GRANTED, and the document at ECF No. 384-1 shall remain visible only to the selected parties.

The Clerk of Court is respectfully directed to close ECF No. 383.

SO ORDERED 10/27/22

  
SARAH L. CAVE  
United States Magistrate Judge

Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.*,  
No. 17 Civ. 7417 (JLR) (SLC)

Dear Judge Cave:

We write respectfully on behalf of Defendant EEA Life Settlements, Inc. to request permission to file under seal Exhibit A, Dkt. 384-1, appended to EEA's letter in opposition to Plaintiff Coventry Capital US LLC's motion to compel, Dkt. 384.

When considering a motion to seal, despite the presumption in favor of public access, the court must consider the “the privacy interests of those resisting disclosure.” *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). Courts will commonly grant a request to seal documents containing “proprietary business information, such as internal analyses, business strategies or customer negotiations” because disclosure of that information could “provide competitors with an unearned advantage.” *SEC v. Telegram Grp., Inc.*, No. 19 Civ. 9439, 2020 WL 3264264, at \*3 (S.D.N.Y. June 17, 2020). Moreover, courts “regularly seal” medical information of non-parties because of the “significant privacy rights to [] medical information.” *Robinson v. De Niro*, No. 19 Civ. 9156, 2022 WL 2712827, at \*2 (S.D.N.Y. July 13, 2022). Because of those significant privacy rights, the Local Rules of this Court advise that such information “not be in the public file.” S.D.N.Y. Loc. R. 5.2, 2013 Committee Note.

Exhibit A is Coventry's requests for admission to EEA. Those requests reveal confidential information pertaining to: (1) EEA's and Coventry's negotiations and their respective valuations of EEA's life-settlement portfolio; and (2) diagnoses of individuals whose policies were in EEA's portfolio. As such, we request that the Court permit Exhibit A, Dkt. 384-1, to remain under seal.

We thank the Court for its consideration.

Respectfully submitted,  
/s/ Lauren F. Dayton  
Lauren F. Dayton

cc: All counsel of record